

THE ABOUSHI LAW FIRM, PLLC

**1441 Broadway Fifth Floor
New York, NY 10018
Telephone: (212) 391-8500
Facsimile: (212) 391-8508
www.Aboushi.com**

July 18, 2022

BY ECF

Hon. Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: El Nabi v. City of New York
Docket No. 21- CV-03768 (LAK)

Dear Judge Kaplan,

We represent Plaintiff in the above referenced matter and write jointly with counsel for Defendants, pursuant to Fed. R. Civ. P. 26(f)(3) to request an extension of the discovery schedule previously ordered on February 14, 2022. Dkt. No. 20.

The Court ordered all fact discovery to be completed by August 11, 2022, for a joint pretrial order to be submitted by November 11, 2022 and for summary judgment motions to also be submitted by November 11, 2022. This is the parties' first request for an extension.

While the undersigned have recently taken over representation of Plaintiff in this matter, there remains substantial discovery left to conduct including depositions of all parties. With the fact discovery less than one month away, the parties require more time to complete fact discovery. Also, as noted by the previous attorney, there are dozens of hours of body worn camera footage and those have yet to be reviewed by newly substituted counsel.

The parties thus respectfully propose that fact discovery is to be completed by December 23, 2022 and for both a joint pretrial order to be submitted and for summary judgment motions to be filed by March 31, 2023.

We thank Your Honor for your time and attention to this matter.

Respectfully,

/s/
Tahanie A. Aboushi

/s/

J. Remy Green

Elena L. Cohen

Cohen&Green P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc: All counsel of record via ECF